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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

FEB 26 2008

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

TIMOTHY D. KANE,)

Plaintiff,)

VS.)

RAYMOND GILBERT and)

JOSEPH PAAVILAINEN,)

Defendant.)

Case No. 07 c 6590

Honorable
George W. Lindberg
Judge Presiding.PLAINTIFF'S OBJECTION TO DEFENDANT'S MOTION FOR A
QUALIFIED PROTECTIVE ORDER AND AUTHORIZATION FOR THE
RELEASE OF HEALTH RECORDS AND QUALIFIED PROTECTIVE ORDER

NOW COMES Timothy D. Kane, Plaintiff pro-se., and Objects to Defendant's Motion for A Qualified Protective Order and Authorization for Release of Health Record, and Qualified Protective Order.

1. Plaintiff objects to paragraphs ("par.") 6., 7., 8., and 9., of Defendant's Qualified Protective Order entry request.

2. Plaintiff has no objection to medical record pertinent to the treatment he received as a proximate result of Defendant's actions as alleged in Plaintiff's Complaint.

3. Plaintiff is on lockdown and unable to research the contents of 42 U.S.C. § 1320d, also, Plaintiff has no idea what 45 CFR or its Part contain; and does not know if such information is accessible in the prison law library. Therefore, Plaintiff Objects to and will not agree to its definition of records, specifically psychiatric/psychological record.

WHEREFORE, Plaintiff Timothy D. Kane, prays this Court Denied Defendant's Motion and limit its Authorization to medical treatment received as a result of the complained violation.

CERTIFICATE OF SERVICE

Timothy D. Kane, pro-se., swear under penalty of perjury that he served the foregoing Notice on the Defendant's Counsel to whom it is directed by placing same in a sealed envelope with first class postage pre-paid, addressed as set forth above, and depositing same in the U.S. Mail before 10p.m. via Correctional Officer on February 20, 2008, at Joliet, Illinois.

s/ Timothy D. Kane